

LISA HOGAN, ESQ. (*pro hac vice* forthcoming)  
[lhogan@bhfs.com](mailto:lhogan@bhfs.com)  
BROWNSTEIN HYATT FABER SCHRECK LLP  
410 17<sup>th</sup> Street, Suite 2200  
Denver, CO 80202  
Telephone: 303.223.1100  
Facsimile: 303.23.1111

TRAVIS F. CHANCE, ESQ., Nevada Bar No. 13800  
[tchance@bhfs.com](mailto:tchance@bhfs.com)  
BROWNSTEIN HYATT FABER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
Telephone: 702.382.2101  
Facsimile: 702.382.8135

*Attorneys for Defendants Area 15 Las Vegas LLC, Area 15  
Global LLC, Fisher Brothers Management Co. LLC, Fisher  
Brothers Financial and Development Company LLC, Arnold  
Fisher, Kenneth Fisher, Steven Fisher, and Winston Fisher*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

GEORGE JARAMILLO, II, an individual,  
  
*Plaintiff,*

v.

AREA 15 LAS VEGAS LLC, a Delaware  
Limited Liability Company, AREA 15  
GLOBAL LLC, a Delaware Limited  
Liability Company, ARNOLD FISHER, an  
Individual, KENNETH FISHER, an  
Individual, STEVEN FISHER, an  
Individual, WINSTON FISHER, an  
Individual, FISHER BROTHERS  
MANAGEMENT CO. LLC, a New York  
Limited Liability Company, FISHER  
BROTHERS FINANCIAL AND  
DEVELOPMENT COMPANY LLC, a  
New York Limited Liability Company, and  
DOES 1-50 Inclusive,

*Defendant.*

CASE NO.: 2:21-cv-00891-RFB-BNW

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)<sup>1</sup>**

Plaintiff GEORGE JARAMILLO, III ("*Plaintiff*"), by and through his undersigned counsel  
of record, the law firms of Brown, Clark, Le, Ames, Stedman & Cevallos LLP and Kaplan Cottner,  
and Defendants AREA 15 LAS VEGAS LLC, AREA 15 GLOBAL LLC, ARNOLD FISHER,

<sup>1</sup> This is the second request as it relates to the Area 15 Defendants.

KENNETH FISHER, STEVEN FISHER, WINSTON FISHER, FISHER BROTHERS MANAGEMENT CO. LLC, and FISHER BROTHERS FINANCIAL AND DEVELOPMENT COMPANY LLC (together, “*Defendants*”), by and through their undersigned counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate to an extension of time to respond to the Complaint, pursuant to FRCP 6(b) and LR IA 6-1, as set forth below:

1. On May 6, 2021, Plaintiff filed his Complaint in this Court against Defendants. *See generally* ECF No. 1.

2. Defendants Kenneth Fisher, Steven Fisher, Winston Fisher, and Fisher Brothers Management Co. LLC (the “*Fisher Defendants*”) have all been served with the Summons and Complaint, and their response deadlines are as follows:

- a. Steven Fisher: June 21, 2021
- b. Kenneth Fisher: June 23, 2021
- c. Winston Fisher: June 30, 2021
- d. Fisher Brothers Management Co. LLC: June 30, 2021

3. Defendant Arnold Fisher has not yet been served and the undersigned counsel has agreed to accept service on his behalf.

4. Defendant Fisher Brothers Financial and Development Company LLC contends that the attempted service upon it reflected in ECF No. 8 was improper; nevertheless, the undersigned counsel has also agreed to accept service on its behalf.

5. Pursuant to this Court’s order, the responses of Area 15 Las Vegas LLC and Area 15 Global LLC (the “*Area 15 Defendants*”) are due July 1, 2021. *See* ECF No. 12.

6. To streamline and provide sufficient time to consolidate the responses for the multiple Defendants in this case, as appropriate, and in the interest of judicial efficiency and conserving resources, the parties have agreed to a global response date for all of the foregoing Defendants of August 2, 2021.

7. This Court may extend the deadline to respond to the Complaint for good cause. *See* FRCP 6(b)(1).

8. There is good cause to grant the extension of time to respond to the Complaint

requested herein, to allow counsel the further opportunity to more fully evaluate and investigate the Complaint's 102 factual allegations alleged against each of the Defendants, prepare the proper response(s) thereto on behalf of each of them, and to consolidate responses for this Court's ease of consideration and review, where appropriate.

9. The instant request is timely, as the first deadline for any of the above Defendants to respond to the Complaint is June 21, 2021. *See* FRCP 6(b)(2) (only requiring an analysis of excusable neglect where extension sought after expiration of the deadline); LR IA 6-1(a) (same).

10. This is the Fisher Defendants' first request for an extension of time to respond to the Complaint and the Area 15 Defendants' Second Request.

11. Defendants expressly reserve any and all defenses available to them, including, but not limited to, those set forth in FRCP 12(b)(1)-(7).

12. The parties make the instant request in good faith and without any intent to delay these proceedings.

Based on the foregoing, Plaintiff and Defendants stipulate that the responses of all Defendants shall be filed on or before August 2, 2021.

DATED 20th day of June, 2021.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

KAPLAN COTTNER

BY: /s/ Travis F. Chance

BY: /s/ Kory L. Kaplan

LISA HOGAN, ESQ. (*pro hac vice* forthcoming)

KORY L. KAPLAN, ESQ.

lhogan@bhfs.com

Email: kory@kaplancottner.com

TRAVIS F. CHANCE, ESQ., Nevada Bar No. 13800

tchance@bhfs.com

BROWN, CLARK, LE, AMES,  
STEDMAN & CEVALLOS LLP  
Edwin B. Brown (*pro hac vice*  
pending)

*Attorneys for Defendants Area 15 Las Vegas LLC,  
Area 15 Global LLC, Fisher Brothers Management  
Co. LLC, Fisher Brothers Financial and Development  
Company LLC, Arnold Fisher, Kenneth Fisher, Steven  
Fisher, and Winston Fisher*

*Attorneys for Plaintiff George  
Jaramillo, II*

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

Dated June 21, 2021